

September 20, 2024

By ECF

The Honorable Dale E. Ho
United States District Judge
U.S. District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. M/Y Amadea*, No. 23-cv-9304 (DEH)

Dear Judge Ho:

Pursuant to the Court's order (ECF No. 244), the parties submit this joint letter regarding the location of Khudainatov's deposition. The two countries identified in previous correspondence as potentially acceptable to both parties as locations for the deposition have acknowledged the United States's requests for the deposition to take place there, but have not yet provided substantive responses either granting or denying permission. The Government has continued to ask for such a response. (The same is true as to the third country from which the Government sought permission, but to which Khudainatov objects). In light of the recent discovery extension, the parties jointly request that they submit a status report on this issue on or before October 4, 2024.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney
Southern District of New York

By: /s/ Jennifer Jude
JENNIFER JUDE
DOMINIKA TARCZYNSKA
Assistant United States Attorneys

MARGARET A. MOESER
Chief
Money Laundering and Asset Recovery
Section, Criminal Division
U.S. Department of Justice

By: /s/ D. Hunter Smith
JOSHUA L. SOHN
D. HUNTER SMITH

Trial Attorneys
Money Laundering and Asset Recovery
Section

JENNIFER KENNEDY GELLIE
Executive Deputy Chief
Counterintelligence and Export Control
Section, National Security Division
U.S. Department of Justice

By: /s/ Yifei Zheng
YIFEI ZHENG
Trial Attorney
Counterintelligence and Export Control
Section

/s/ Adam C. Ford
Adam C. Ford
Renee Jarusinsky
Robert Landy
Ford O'Brien Landy LLP

Counsel for Claimants Eduard Yurievich
Khudainatov and Millemarin Investments Ltd.